

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

R. ALEXANDER ACOSTA, Secretary of *
Labor, United States Department of Labor, *

Plaintiff, *

v. * Civil Action No. 1:19-cv-00093-JJM-LDA

MADEIRA RESTAURANT INC. d/b/a *
MADEIRA RESTAURANT, THE *
WATERFRONT RESTAURANT AND *
LOUNGE INC. d/b/a AL'S WATERFRONT *
RESTAURANT & MARINA, and *
ALBERTINO MILHO, DAVID MILHO *
and KAREN DASILVA, Individually, *

Defendants. *

**JOINT MOTION FOR ADDITIONAL EXTENSION OF DISCOVERY DEADLINE DUE
TO CORONA VIRUS PANDEMIC**

The parties, pursuant to Local Rule 7, jointly request that this Court further extend the discovery deadline in this case, which is currently April 30, 2020. The parties have been making substantial progress in coming to a resolution, but more time is still needed. Further, due to the public health crisis of the Coronavirus Pandemic, an extension is needed in order to safely hold in-person depositions if that becomes necessary. The parties have been delaying holding depositions in order to avoid expending those resources while engaging in settlement negotiations. The parties request that the discovery deadline be extended until June 30, 2020.

Respectfully submitted,

Post Office Address:
Office of the Solicitor
J.F.K. Federal Building
Room E-375
Boston, MA 02203
Tel. (617) 565-2500

Kate S. O'Scannlain
Solicitor of Labor

Maia S. Fisher
Regional Solicitor

Fax (617) 565-2142
salzberg.susan@dol.gov
MA BBO No. 556437

/s/ Susan G. Salzberg
Senior Trial Attorney

United States Department of Labor
Attorneys for the Plaintiff

The Law Office of
James J. Lombardi III Esq.
481 Atwood Avenue
Cranston, RI 02920
Phone: (401) 454-5900
lombardilaw@cox.net

/s/ James J. Lombardi III., Esq
Attorney for Defendants

Date: April 7, 2020